1 Thomas F. Christensen, Esq. Nevada Bar #2326 2 Christensen Law Offices, LLC 3 1000 S. Valley View Blvd. Las Vegas, NV 89107 4 T:702-870-1000 courtnotices@injuryhelpnow.com 5 Attorneys for Plaintiffs 6 7

IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

THOMAS CHRISTENSEN, E. BREEN ARNTZ, AND GARY LEWIS Plaintiffs,

CASE NO: 2:22-ev-02125-JAD-KF

VS.

through V,

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED AUTOMOBILE INSURANCE COMPANY; LEWIS ROCA ROTHGERBER CHRISTIE; DANIEL POLSENBERG: J. CHRISTOPHER JORGENSEN; ABRAHAM SMITH, MATTHEW TSAI: WINNER & SHERROD f/k/a ATKIN WINNER & SHERROD; THOMAS E. WINNER; ROGERS MASTRANGELO CARVALHO & MITCHELL, LTD; STEPHEN ROGERS; and DOES I

Defendants,

STIPULATED MOTION AND ORDER TO EXTEND DEADLINE TO RESPOND TO MOTIONS TO STRIKE (ECF 13). MOTIONS TO DISMISS (ECF 15,16,21,25) & MOTIONS FOR EXCESS PAGES AND EXTENSION OF TIME(ECF 17,24,29)

[ECF No. 37]

oppositions pursuant to FRCP 6(c) and LR 1A 6-1. A Motion for Stay (ECF#30) has already been fully briefed and the Plaintiff's Motion for Remand(ECF#10) will be fully briefed by February 24, 2023. Defendants have also filed motions to dismiss under FRCP 12(b)(6) (ECF Nos. 15 & 16) and NRS 41.660 (ECF No. 21), a motion for leave to file excess pages (ECF No. 17 & 24), a motion to dismiss (or alternatively, to quash) under 12(b)(4) (ECF No. 25), a motion to strike the amended complaint (ECF No. 13), and a motion for a retroactive extension of time ECF No. 29). These were all filed on January 25 and January 26, 2023, and served on plaintiffs

The parties jointly move for and stipulate to an extension of deadlines on certain pending

1

those same days. Thereafter, the parties stipulated and moved the Court for an extension of certain deadlines, which the Court granted, making the responses to the above-noted Motions all due on February 23, 2023.

STIPULATION

With good cause, Plaintiffs and Defendants have mutually agreed to a one week extension on all oppositions due to the currently pending motions as follows:

- 1. ECF 13-Motion to Strike
- 2. ECF 15 -Motion to Dismiss based on 12(b)(6)
- 3. ECF 16- Motion to Dismiss based on 12 (b)(4)
- 4. ECF 17-Motion for Leave to File Document with Excess pages (referring to ECF 15)
- 5. ECF 21-Motion to Dismiss per NRS 41.660 (originally filed as part of ECF 15)
- 6. ECF 24-Motion for Leave to File Document with Excess pages (referring to ECF 21)
- 7. ECF 25-Motion to Quash (originally filed as part of ECF 16)
- 8. ECF 29-Motion to Extend/Shorten Time retroactively

The parties mutually request that the Court approve a short extension on Responses to the foregoing list of documents, if any, and Order that they all be filed on or before March 2, 2023. There is good cause for these agreed upon extensions. Earlier this week in Las Vegas, there was a severe thunderstorm with heavy winds experienced throughout the valley. Counsel for Plaintiffs' home office and commercial office space both experienced significant slowdown of internet speeds and then a complete lack of connectivity during some of the time they had planned to be working on the voluminous number of responses that are due today by extension. This matter is complex and the difficulties suffered by Defendants in the original filing of the Motions, which required some documents with more than one type of relief to be refiled to

| 1 | comply with LR 1C 2, has made responding to the Motions somewhat more complex as well, | |
|-------|---|---|
| 2 3 | requiring additional time. One additional week should allow Plaintiffs to finalize and file their | |
| 4 | responses to the pending motions as listed above. | |
| 5 | DATED this 23rd day of February, 2023. | |
| 6 | Christensen Law Offices, LLC | Lewis Roca Rothgerber Christie, LLP |
| 7 | s/Thomas F. Christensen | /s/Abraham Smith |
| 8 | Thomas Christensen, Esq. Nevada Bar #2326 | Abraham G. Smith, Esq. Nevada Bar #13250 |
| 9 | 1000 S. Valley View Blvd. | 3993 Howard Hughes Parkway, Suite 600 |
| 10 | Las Vegas, NV 89107 702-870-1000 | Las Vegas, NV 89169 702-949-8200 |
| | courtnotices@injuryhelpnow.com | ASmith@lewisroca.com |
| 11 | Attorney for Plaintiffs | Attorney for UAIC |
| 12 | CAMPBELL & WILLIAMS | Lewis Roca Rothgerber Christie, LLP |
| 13 | s/Philip Erwin | /s/Abraham Smith |
| 14 | DONALD J. CAMPBELL (SBN 1216) PHILIP R. ERWIN SBN 11,563) | Abraham G. Smith, Esq. Nevada Bar #13250 |
| 15 | 710 South Seventh Street, Suite A | 3993 Howard Hughes Parkway, Suite 600 |
| 16 | Las Vegas, Nevada 89101 702) 382-5222 | Las Vegas, NV 89169 702-949-8200 |
| 17 | Attorneys for Winner & Sherrod | ASmith@lewisroca.com |
| 18 | and Thomas E. Winner | Attorney for Lewis Roca Rothgerber Christie, LLP, D. Polsenberg, J. Christopher Jorgensen |
| 19 | | Abraham Smith and Matthew Tsai |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| | | |
| 28 | | |

ORDER GRANTING EXTENSION Based on the parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that the joint request for a one week extension on deadlines for oppositions to pending motions as listed in the stipulation is GRANTED. Responses to ECF Nos. 13, 15, 16, 17, 21, 24, 25 and 29 are now due March 2, 2023. UNITED STATES DISTRICT JUDGE Date: February 24, 2023 Submitted by: Christensen Law Offices, LLC /s/ Thomas F. Christensen Thomas Christensen, Esq. Nevada Bar #2326 1000 S. Valley View Blvd. Las Vegas, NV 89107 PH: 702-870-1000 courtnotices@injuryhelpnow.com